

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**In re:**

**Pedro Alexis Sánchez Matos**

**Debtor(s)**

**Case No.: 16-03579-BKT13**

**Chapter 13**

**PETITION FOR PAYMENT OF UNCLAIMED FUNDS**

**TO THE HONORABLE COURT:**

**NOW APPEARS**, Petitioner Dilks & Knopik, LLC, as assignee to the unclaimed funds for Pedro Alexis Sánchez Matos, EIN 74-3049851, 35308 SE Center Street, Snoqualmie, WA 98065, telephone number 425-836-5728 and email address [admin@dilksknopik.com](mailto:admin@dilksknopik.com), through the undersigned counsel and respectfully requests pursuant to Puerto Rico Local Bankruptcy Rule 3011(b), states that Petitioner became entitled to receive \$6,720.89 as distributions in the above-entitled case, and now appears in the records of this Court as the owner of said funds. The amount requested is being held in the Treasury of the United States as unclaimed funds.

Petitioner represents it is entitled to receive the requested funds based upon Petitioner is the owner.

The Petitioner submits with this petition the following documents as proof of the Petitioner's identity and status, and the owner's claim of entitlement:

1. Certificate of LLC Resolution & Statement of Authority subscribed by Brian J. Dilks and Caryn Marie Dilks dated January 23, 2020.
2. U.S. Courts Unclaimed Funds Locator for case In Re Pedro Alexis Sánchez Matos, 16-03579-BKT13.
3. Assignment Agreement dated August 20, 2020 between Dilks & Knopik, LLC, as assignee to the unclaimed funds, and Pedro Alexis Sánchez Matos, as assignor of the unclaimed funds. The assignment agreement states that the assignor was a properly named and lawful creditor in the case In Re Pedro Alexis Sánchez Matos, 16-03579-BKT13 in the amount of \$6,720.89 (hereinafter, the "funds"). Remittance to the assignor was not successful, and pursuant to Federal Rule of Bankruptcy Procedure 3011 and 11 U.S.C. 347, the funds were deposited in the Registry of the Court. Since the assignor, Pedro Alexis Sánchez Matos, is not desirous of attempting collection of the funds, nor wishes to incur the time and expense of such collection, it assigned and conveyed to the assignee, Dilks & Knopik, LLC, for good and valuable consideration, all of assignor's rights, title and interest of the funds, without the presence of undue influence or coercion. Thus, Dilks & Knopik, LLC is entitled to the disbursement of the unclaimed funds, and not the assignor, Pedro Alexis Sánchez Matos.

4. Notice of Assignment dated August 20, 2020 between the assignor, Pedro Alexis Sánchez Matos, and the assignee, Dilks & Knopik, LLC.
  5. Driver's license for Pedro Alexis Sánchez Matos issued by the state of Texas.
  6. Driver's licenses of Brian Jacob Dilks, Caryn Marie Dilks, Jeffrey Allen Hudspeth and Andrew Thomson Drake issued by the state of Washington, as well as their contact information.
  7. Request for Payee Information and Tin Certification for the assignee, Dilks & Knopik, LLC, to whom the disbursement of funds should be granted, in accordance with the Assignment Agreement described above.
- Dated August 20, 2020.

Therefore, we inform the Court that the Petitioner's postal address for the receipt of disbursement is the following: 35308 SE Center St., Snoqualmie, WA 98065.

**WHEREFORE**, it is respectfully requested that the Court take notice of the foregoing and requests that it enter an order directing payment of the unclaimed funds to the Petitioner, Dilks & Knopik, LLC, in accordance with the documents and information submitted in support of this petition.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico on this 10<sup>th</sup> day of September, 2020.

**CERTIFICATE OF SERVICE:**

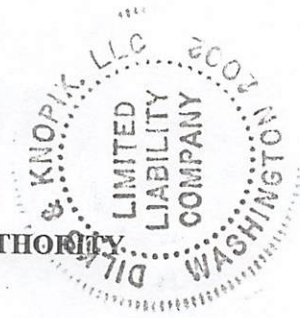
I HEREBY CERTIFY that the foregoing document has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record registered in the use of the CM/ECF system.

I HEREBY CERTIFY that on this date a true and correct copy has been served through regular mail to the debtor, debtor's attorney, the trustee, the United States Trustee and the United States Attorney at the addresses of record with this honorable Court if such are not registered in the use of the CM/ECF system.

**PIRILLO LAW LLC**  
*Attorney for Petitioner*  
PO Box 194981  
San Juan, PR 00919-4981  
Tel.: (787) 957-3082  
E-mail: [ttorres@pirillolaw.com](mailto:ttorres@pirillolaw.com)

By: /s/ Tania Torres-Halais  
Tania Torres-Halais  
USDC-PR No. 229505

# Dilks & Knopik



## CERTIFICATE OF LLC RESOLUTION & STATEMENT OF AUTHORITY

The undersigned Members of Dilks & Knopik, LLC, an LLC, duly organized under the laws of Washington (hereinafter "The LLC"), hereby certify that the following resolutions were duly adopted by said Members of The LLC on June 7<sup>th</sup>, 2002 and that such resolutions have not been modified or rescinded as of the date hereof:

RESOLVED, that Brian J Dilks, Caryn M Dilks, Andrew T. Drake and Jefferey Hudspeth, are hereby authorized and directed for and on behalf of The LLC to execute all legal documents as approved by him/her as being in the best interests of The LLC; and to take any and all further actions which may be necessary or appropriate to commence and complete said construction in such a manner as being, in his/her opinion, in the best interests of the LLC.

RESOLVED, that this action may be executed in counterparts and by facsimile signatures, each of which shall be deemed an original and all of which together shall constitute one action.

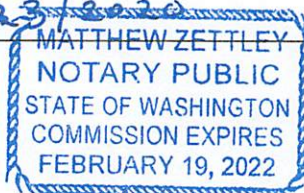
IN WITNESS WHEREOF, the undersigned has executed this instrument as of this 23<sup>rd</sup> day of

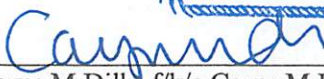
January, 2020



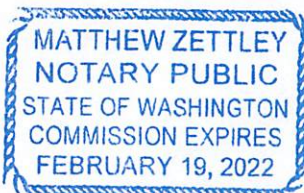
Brian J Dilks

Date: 1/23/2020

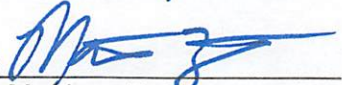


  
Caryn M Dilks f/k/a Caryn M Knopik

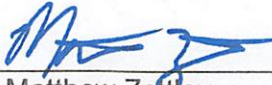
Date: 1-23-2020



Subscribed and sworn to me this  
23<sup>rd</sup> day of January 2020

Notary Signature   
Matthew Zettley  
My Commission Expires: 2/19/22

Subscribed and sworn to me this  
23<sup>rd</sup> day of January 2020

Notary Signature   
Matthew Zettley  
My Commission Expires: 2/19/22

## U.S. Courts Unclaimed Funds Locator

[Home](#)[About](#)

Court / PRB

[Edit Search](#)

Case Number	16-03579	Page Total	\$6,720.89
Last/Business Name	PEDRO ALEXIS SANCHEZ MATOS	First Name	

Creditors | 1

	Court	Creditor Name	Amount
<input checked="" type="checkbox"/>	PRB	Pedro Sanchez Matos	\$6,720.89



# Dilks & Knopik

## Assignment Agreement

This Assignment Agreement (the "Agreement") is entered into as of August 20, 2020 (the "Effective Date") by and between Dilks & Knopik, LLC, with a principal place of business at 35308 SE Center Street, Snoqualmie, WA 98065, (the "Assignee") and Pedro Alexis Sanchez Matos with an address of 5769 Belt Line Road, Apt. 1021, Dallas TX 75254 (the "Assignor").

1. Assignor is/was a debtor in the case (16-03579-BKT13) as filed in the District of Puerto Rico (the "Case"). As a debtor in the Case, Assignor was entitled to distribution of funds from the assets of the Bankruptcy Estate in the approximate amount of \$6,720.89 (the "Funds"). Remittance to Assignor was not successful, and pursuant to Federal Rule of Bankruptcy Procedure 3011 and 11 U.S.C. 347, the Funds were deposited into the Registry of the Court. The Funds then being subject to withdrawal in accordance with 28 U.S.C. 2042.
2. Assignor not desirous of attempting collection of the Funds, nor wishing to incur the time and expense of such collection, does hereby wish and does assign, and convey to the Assignee, for good and valuable consideration, all of Assignor's rights, title and interest in the Funds, without the presence of undue influence or coercion.

NOW THEREFORE, in consideration of mutual obligations, covenants, representations, and warranties herein, the parties agree as follows:

3. Assets Assigned: The assets herein assigned to Assignee are those stated in paragraph 1 above, that collectively are the Funds held for the benefit of Assignor by the Clerk of the Court of the court identified in paragraph 1 in the Unclaimed Funds Registry.
4. Consideration: The consideration herein given by Assignee to Assignor shall be the sum \$3,696.49 which sum shall be remitted to Assignor. A check will be issue to the Assignor for the above stated amount prior to the claim/application/motion is submitted to court.
5. This assignment shall be deemed an absolute and unconditional assignment of funds for the purpose of collection and satisfaction, and shall not be deemed to create a security interest.
6. Assignor represents and warrants to Assignee that no payment or other distribution has been received by or on behalf of Assignor in full or partial satisfaction of the assigned rights; that Assignor has not previously sold or assigned the rights, in whole or in part, to any party.
7. Power of Attorney: To the extent necessary under applicable law, the Assignor does hereby appoint for the limited purpose of collection of the Funds and fulfillment of Assignor's obligation(s) under this Agreement, Dilks and Knopik, LLC as its attorney-in-fact.
8. This Agreement constitutes the entire agreement and understanding between the parties with respect to the subject matter above.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed as of the day and year first written above.

Assignor:



Pedro Alexis Sanchez Matos

Assignee:



Dilks & Knopik, LLC

Brian J Dilks – Authorized Signatory





**NOTICE OF ASSIGNMENT**

For good and valuable consideration, the undersigned, Pedro Alexis Sanchez Matos ("Assignor"), hereby, assigns, conveys and transfers over and unto Dilks & Knopik, LLC ("Assignee"), any and all of right, title and interest in and to the below referenced funds.

The Assigned funds:

Debtor: Pedro Alexis Sanchez Matos  
Court: United States Bankruptcy Court - District of Puerto Rico  
Case Number: 16-03579-BKT13  
Chapter: 13  
Unclaimed Amount: \$6,720.89

FUNDS ARE BEING ASSIGNED "AS-IS, WHERE-IS" WITH NO WARRANTIES OR REPRESENTATIONS WHATSOEVER, EXCEPT AS EXPRESSLY PROVIDED IN THE ASSIGNMENT AGREEMENT, INCLUDING, WITHOUT LIMITATION, WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

IN WITNESS WHEREOF, the parties hereto have caused this notice of assignment to be executed as of the Thursday, August 20, 2020.

Pedro Alexis Sanchez Matos

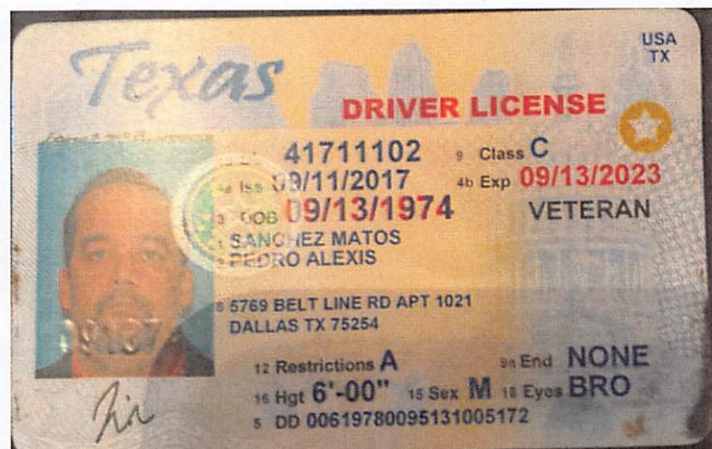
A handwritten signature in blue ink, appearing to be 'P. Sanchez'.

---

Signature

A large, stylized handwritten signature in blue ink, possibly reading 'PD'.



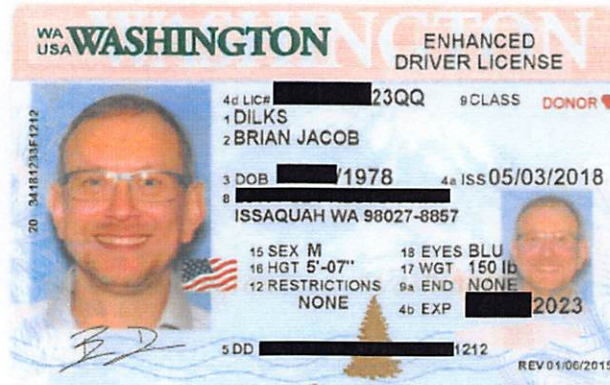


## Dilks & Knopik

*When Success Matters*

**Brian Dilks**  
Managing Member

35308 SE Center Street  
Snoqualmie, WA 98065  
Ph. 877-836-5728 x 101  
Fx. 877-209-8249  
brian.dilks@dilksknopik.com  
www.dilksknopik.com



## Dilks & Knopik

*When Success Matters*

**Caryn Knopik**  
Managing Member

35308 SE Center Street  
Snoqualmie, WA 98065  
Ph. 877-836-5728 x 102  
Fx. 877-209-8249  
caryn.knopik@dilksknopik.com  
www.dilksknopik.com

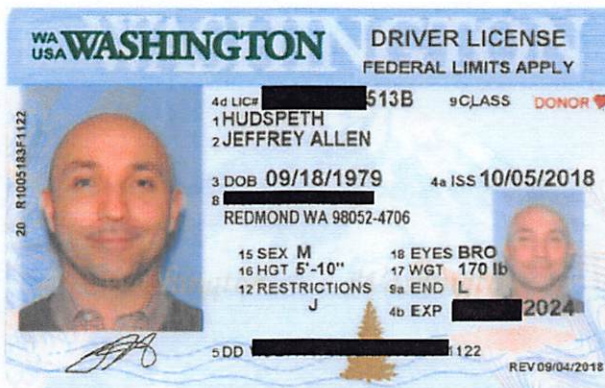


## Dilks & Knopik

*When Success Matters*

**Jeff Hudspeth**  
Vice President - Accounts

35308 SE Center Street  
Snoqualmie, WA 98065  
Ph. 877-836-5728 x 104  
Fx. 877-209-8249  
jeff.hudspeth@dilksknopik.com  
www.dilksknopik.com

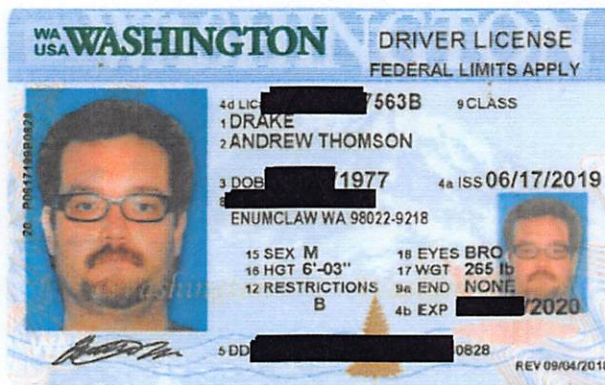


## Dilks & Knopik

*When Success Matters*

**Andrew Drake**  
Vice President - Operations

35308 SE Center Street  
Snoqualmie, WA 98065  
Ph. 877-836-5728 x 123  
Fx. 877-209-8249  
andrew.drake@dilksknopik.com  
www.dilksknopik.com



BBB  
accredited  
since 2003





AO 213P (9/19)

## REQUEST FOR PAYEE INFORMATION AND TIN CERTIFICATION

Refer to the instructions page for further information on completing this form.

*Vendors providing goods and services must use the AO 213 form.*

### Part 1 Payee Information

Line 1. Payee Name: Dilks and Knopik LLC

Line 2. Additional payee information: (if applicable) as assignee to Pedro Alexis Sanchez Matos

### Part 2 Business Name (if different from above)

Enter your TIN in the appropriate box.

Part 3 The TIN provided must match the name given in Part 1, Line 1.

EIN: 7 4 - 3 0 4 9 8 5 1

*Enter only an EIN or SSN - NOT BOTH.*

SSN: - -

### Part 4 Select the appropriate box below for U.S. tax classification for person or entity listed in Part 1, Line 1.

☐ Individual or single member LLC

☐ Corporation (Payments related to attorneys' fees or gross proceeds paid to attorneys)

☒ LLC (Except single member)

☐ Partnership

(Select one:) ☐ C Corp ☒ S Corp ☐ Partnership ☐ Trust/Estate

☐ Other: \_\_\_\_\_

### Part 5 Mailing Address

Street address: 35308 SE Center Street

City: Snoqualmie

State: WA Zip code: 98065

Point of Contact (if different from Part 1, Line 1 above)

Name: Brian Dilks or Andrew Drake

Phone #: (425) 836-5728

Email Address: admin@dilksknopik.com

### Part 6 Electronic Funds Transfer (EFT) Information (OPTIONAL)

Owner(s) name as it appears on bank account:

Dilks & Knopik

Bank Name: Key Bank

Routing #: (Must contain 9 digits)

125000574

Payee must select an account type: (Select one)

☒ Checking ☐ Savings

Account Number: (do not include check number)

472741017389

### Part 7 Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number; and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the IRS that I am subject to backup withholding as a result of a failure to report all interest and dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
3. I am a U.S. citizen or other U.S. person (defined in the instructions).

The IRS does not require your consent to any provision of this document other than the certifications required to avoid backup withholding.

Signature: \_\_\_\_\_

Date: 8/20/20

### For Judiciary Use Only

Select those boxes that apply:

☐ Addition

☐ Change

Vendor Code: \_\_\_\_\_

☐ Active

☐ Inactive

Vendor Type: \_\_\_\_\_

(Trustee or Vendor)

Vendor Administrators: Attach this form to the JIFMS MANL document. This form can also be submitted, subject to separation of duties requirements, via HEAT at: <https://nsms.ao.den>. The service request can be found under Financial Management Services> JIFMS Vendor Additions or Updates. For FAS4T users (CCAM only), send this form to the local court vendor administrator. For questions regarding JIFMS and court FAS4T, please contact the National Support Desk at (210) 536-5000. This form should be completed including the vendor's signature and submitted by Judiciary staff only.

*Sensitive information must be securely maintained and only visible to designated staff.*